

REMARKS

Reconsideration of the pending application is respectfully requested on the basis of the following particulars:

Claim for foreign priority

Applicant has claimed foreign priority based on Taiwanese application 92210666. The examiner is referred to the Application Data Sheet (ADS) filed with the present application on March 30, 2004, wherein the claim for foreign priority is found at page 4.

Further, Applicant notes that a certified copy of the priority document was submitted with the present application. The certified copy of the priority document can be found in the Image File Wrapper with the document description "Certified Copy of Foreign Priority Application" dated March 29, 2004.

Applicant requests that the examiner acknowledge the claim for foreign priority and the receipt of the certified copy of the priority document in the next Office communication.

Drawings

Applicant notes that in the recent Office action, the Office Action Summary indicates that the drawings are accepted by the examiner, while in the detailed action the examiner asserts that "the applicant's drawing submitted are not acceptable for examination purposes."

Since no further discussion of any shortcomings or deficiencies of the drawings is provided, Applicant believes that the statement that the drawings are not acceptable is a typographical error and that the drawings are accepted as indicated in the Office Action Summary.

The examiner is requested to confirm that the drawings are acceptable in the next Office communication.

In the claims

Claim 1 has been amended to more clearly describe the present invention. Claims 2-7 have been cancelled, and new claims 8-12 are added.

Rejection of claims 1-7 under 35 U.S.C. § 103(a)

Claims 1-7 presently stand rejected as being unpatentable over Chen et al (U.S. 2004/0182938, hereafter "Chen") in view of Kimura (U.S. 5,625,593). This rejection is respectfully traversed for at least the following reasons.

Applicant notes that Chen was filed on August 13, 2003, while the priority date of the present application is June 11, 2003 (based on Taiwanese application 92210666). Therefore, it is respectfully submitted that Chen cannot be properly applied against the present application.

Moreover, Applicant notes that the Chan and Kimura, either individually or in combination, fail to form a prima facie basis of obviousness of the presently amended claims, since the references fail to teach or suggest each and every element set forth in the claims and because there is no motivation or suggestion to combine the references.

Chen discloses a "universal micro memory card" that utilizes signals transferred via MF1 and MF2 pins (D+ and D- pins of a USB interface) as signals to detect the type of system interface being used (see *Chen* [0022]).

In particular, when Chen's universal micro memory card is inserted in a system interface, its internal circuitry can receive initialization signals sent from the system end via the MF1 and MF2 pins to detect, based on variations in the initialization signals, the type of system interface being used.

In other words, "the D+ and D- pins of USB interface may be modified as multiplexed signal pin MF1 and MF2, which may be used to transfer corresponding signals according to the transmission protocol for the memory card system interface" (*Chen* [0020]).

“When said universal micro memory card is inserted in a system interface, its internal circuit can receive initialization signals sent from the system end via the redefined MF1 pin (originally was D+ pin of USB interface) and MF2 pin (originally was D- pin of USB interface) and detect potential variation in those initialization signals to determine the type of system interface being used” (*Chen* [0027]).

Thus, *Chen* determines the type of system interface by transferring signals, which requires an internal circuit for receiving and analyzing the signals to make a determination.

However, in the present application the type of system interface being used can be determined by simply detecting the presence of a high or a low voltage level. This is achieved by using a pull-up (pull-down) resistor in the memory card to couple with a pull-down (pull-up) resistor in the card reader to provide a high voltage level or a low voltage level. Such a resistor configuration is easy to implement and very stable for providing a voltage level so that no erroneous determination is made.

Kimura discloses “a memory card circuit with separate buffer chips” in which “a buffer is provided in each of input and output terminals of storage means and the storage means is cut off from outside by the buffer at the time of inserting or detaching a memory card into or from a terminal unit, whereby the stored content of the storage means can be prevented from being damaged” (*Chen*; abstract).

Thus, the buffer of *Kimura* is provided to protect the memory card from damage when the memory card is inserted or removed from the terminal (such as a card reader). However, there is no teaching or suggestion that the buffer (or any other aspect of *Kimura*) relates to detecting one of a plurality of interfaces or to enabling or activating one of a plurality of memory card interface according to the detected interface type.

There is no motivation or suggestion for modifying *Chen*, which detects an interface type according to signals transferred on USB pines, with the teachings of *Kimura* which provides a buffer for circuit protection, to arrive at the present invention wherein

pull-up and pull-down resistors are provided to determine the type of system interface being used by simply detecting the presence of a high or a low voltage level.

For at least these reasons, it is respectfully submitted that claims 1 and 8-12 are allowable over the cited references, and withdrawal of the rejection is respectfully requested.

Conclusion


In view of the amendments to the claims, and in further view of the foregoing remarks, it is respectfully submitted that the application is in condition for allowance. Accordingly, it is requested that claims 1 and 8-12 be allowed and the application be passed to issue.

If any issues remain that may be resolved by a telephone or facsimile communication with the Applicant's attorney, the Examiner is invited to contact the undersigned at the numbers shown.

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Respectfully submitted,


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